

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Gillman, Bruton & Capone, LLC
770 Amboy Avenue
Edison, NJ 08837
(732) 661-1664
Attorney for the Debtor(s)

By: Justin M. Gillman, Esq.

In Re:

Paul Kim
Young Sook Kim

Case No.: 18-15840

Judge: CMG

Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following **(choose one)**:

1. ☐ Motion for Relief from the Automatic Stay filed by _____ ,
creditor,

A hearing has been scheduled for _____ , at _____ .

☒ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for August 7, 2019 , at 9:00 a.m. .

☐ Certification of Default filed by _____ ,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons **(choose one)**:

☒ Payments have been made in the amount of \$ Current Per Plan , but have not
been accounted for. Documentation in support is attached.

☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

☒ Other (**explain your answer**):

In response to Trustee's Motion to Dismiss, Debtors have filed Motion to Modify the Claim of M&T Bank per prior loan modification has been filed and hearing is scheduled for 9/18/2019

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: 7/29/2019

/s/ Paul Kim
Debtor's Signature

Date: 7/29/2019

/s/ Young Sook Kim
Debtor's Signature

NOTES:

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.